

Approved: M. Shin
 CHRISTY SLAVIK
 Assistant United States Attorney

Before: HONORABLE ROBERT W. LEHRBURGER
 United States Magistrate Judge
 Southern District of New York

22 MAG 2510

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	:	
UNITED STATES OF AMERICA	:	<u>COMPLAINT</u>
	:	
- v. -	:	Violations of
	:	21 U.S.C. §§ 841, 846
FELIX GONZALES,	:	
ANGELA URENA,	:	
	:	COUNTY OF OFFENSE:
Defendants.	:	NEW YORK
	:	
- - - - -	x	

SOUTHERN DISTRICT OF NEW YORK, ss.:

ADAM ONDIRA, being duly sworn, deposes and says that he is a special agent with the Department of Homeland Security - Homeland Security Investigations ("HSI") and charges as follows:

COUNT ONE
(Narcotics Conspiracy)

1. On or about March 15, 2022, in the Southern District of New York and elsewhere, FELIX GONZALES and ANGELA URENA, the defendants, and others known and unknown, knowingly and intentionally did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that FELIX GONZALES and ANGELA URENA, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that FELIX GONZALES and ANGELA URENA, the defendants, conspired to distribute and possess with intent to distribute was 400 grams and more of mixtures and substances containing a detectable amount of

fentanyl, in violation of Title 21, United States Code, Section 841(b) (1) (A) .

(Title 21, United States Code, Section 846.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

4. I am a special agent with HSI and I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation of this matter, my conversations with other law enforcement agents and witnesses, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

5. Based on my participation in this investigation, my review of law enforcement reports and records, and my conversations with other law enforcement officers, I have learned, in substance and in part, the following:

a. A confidential source of information ("CS-1") knew an individual who was later identified as a co-conspirator ("CC-1") of FELIX GONZALES and ANGELA URENA, the defendants, as a seller of fentanyl.¹

b. On or about March 2, 2022, CC-1 reached out to CS-1 via WhatsApp message regarding the sale of one kilogram of fentanyl to CS-1.

c. Between on or about March 2, 2022 and March 15, 2022, CC-1 and CS-1 had multiple conversations via WhatsApp voice and text messages and FaceTime calls regarding the sale of

¹ CS-1 has been providing information to the Drug Enforcement Administration ("DEA") since approximately 2020 in exchange for money. The information CS-1 has provided has been corroborated by, among other things and as described below, text messages exchanged between CS-1 and CC-1, as well as law enforcement observations and records. CS-1 has previously provided information to law enforcement, which has led to law enforcement making arrests and executing search warrants.

two "tenni's," which CS-1 understood to mean two kilograms of fentanyl.² CC-1 explained that he would get the drugs from his "primo," later identified as GONZALES. Initially CC-1 told CS-1 that the price per kilogram would be \$37,000, but later dropped the price to \$32,000 per kilogram. Subsequently, CC-1 informed CS-1 that one kilogram of the fentanyl had been sold, and therefore, only one kilogram of fentanyl was for sale.

d. On or about March 14, 2022, CC-1 and CS-1 agreed to meet on March 15, 2022, so that CC-1 could facilitate the sale of one kilogram of fentanyl to CS-1.

e. On or about March 15, 2022, CC-1 sent CS-1 CC-1's location on Google maps, showing the vicinity of 243 West 179th Street in the Bronx. CS-1 drove a vehicle to that area, and law enforcement agents set up surveillance in the area. After CS-1 arrived in the area, law enforcement agents observed two individuals later identified as CC-1 and GONZALES approach CS-1's vehicle and enter the vehicle. GONZALES entered the front passenger side of the vehicle, and CC-1 entered the rear passenger side of the vehicle.

f. Law enforcement agents then observed CS-1 drive the vehicle around the block. Subsequently, law enforcement officers observed an individual later identified as URENA, who was holding a white plastic shopping bag (the "White Bag"), approach the front passenger side of CS-1's vehicle. URENA handed the White Bag to GONZALES.

g. After URENA handed GONZALES the White Bag, CS-1 gave a pre-arranged signal to law enforcement agents, indicating that the transaction had taken place. Law enforcement agents approached CS-1's vehicle and placed CC-1, GONZALES, and URENA under arrest.

h. After the arrests, law enforcement agents discovered the White Bag on the passenger side of CS-1's vehicle, where GONZALES had been sitting. Inside the White Bag was a brick of white powdery substance, which is consistent with the appearance of fentanyl, and, given the conversation about the sale of fentanyl between CS-1 and CC-1 as described above,

² Communications between CC-1 and CS-1 were recorded, and were primarily in Spanish. The messages were translated by law enforcement agents, and are summarized herein only in sum and substance.

is suspected to be fentanyl. Additionally, law enforcement agents searched URENA and found a scale in URENA's pocket.

WHEREFORE, deponent respectfully requests that FELIX GONZALES and ANGELA URENA, the defendants, be imprisoned or bailed, as the case may be.

S/ by the Court with permission
Special Agent Adam Ondira
HSI

Sworn to me this
16th day of March, 2022



THE HONORABLE ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK